

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules)	CC Docket 94-102
to Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	

COMMENTS IN SUPPORT OF DECLARATORY RULING

Phase II Testing and Consulting, LLC, (Phase 2) hereby submits the following support letter to the supplement to the "Request for Declaratory Ruling" that The Association of Public Safety Communications Officials, (APCO) filed on October 6, 2004 (hereinafter "Request"), in the above-referenced proceeding. The Request seeks clarification regarding the geographic area over which a wireless carrier must provide the levels of 9-1-1 location accuracy specified in the Commission's rules and the degree to which carriers must provide accuracy data to relevant Public Safety Answering Points ("PSAPs").

Phase II Testing and Consulting is a new LLC, developed to support the public safety community, and 9-1-1 centers, with testing for wireless 9-1-1 calls made to their PSAPS.

Our company is comprised of public safety professionals who have identified the need for wireless testing and are concerned with the footprint to be tested that is recommended and supported by the Carriers. As public safety professionals, we know how important it is to provide accurate location information to the call takers and support, at a minimum, Metropolitan Statistical Areas (MSAs) and Rural Statistical Areas (RSAs) testing. State-wide compliance testing (as

suggested by NRIC VII) is not acceptable. We also suggest that testing be required every two years to ensure no degradation of the networks.

APCO explained in its Request that existing Commission rules and policies are unclear on several key issues related to wireless carriers' obligations to provide location

information to PSAPs. APCO noted that the Emergency Service Interconnection Forum

(ESIF) and the Network Reliability and Interoperability Council VII (NRIC VII) had

attempted to address some of these issues, but were unable to reach consensus. As a representative to the NRIC process, we can speak to the lack of consensus and strong carrier support for statewide testing that we, local public safety officials, do not support.

Despite substantial efforts by all parties, the deliberations did not lead to a consensus among all major public safety and industry participants. Phase II supports APCO and does not concur with the NRIC VII report, as critical issues were left unresolved, deferred, or addressed with vague language. Whereas APCO urged the Commission to provide the necessary guidance to ensure meaningful implementation and enforcement of the wireless E9-1-1 rules, Phase 2 would like to be on record as supporting their request.

Respectfully Submitted,

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